



APPLICATION GRANTED  
SO ORDERED

*J G Koeltl*  
John G. Koeltl, U.S.D.J.

8/7/08

U.S. Department of Justice

United States Attorney  
Southern District of New York

USDS SDNY

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86 Chambers Street, Third Floor  
New York, New York 10007

August 1, 2008

By Hand

The Honorable John G. Koeltl  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

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Re: Amnesty International USA et al. v. McConnell et al.  
08 Civ. 6259 (JGK)

Dear Judge Koeltl:

We represent the defendants in the above-referenced action brought by plaintiffs to challenge the constitutionality of the Foreign Intelligence Surveillance Act, 50 U.S.C. § 1801, et seq., as amended by the Foreign Intelligence Surveillance Act Amendments Act of 2008, which the President signed into law on July 10, 2008. We write on behalf of all parties to request that the Court approve a schedule for cross-motions in this case.

Following plaintiffs' letter to the Court dated July 15, 2008, the parties conferred to discuss a proposed briefing schedule for dispositive motions. Our joint proposal is as follows:

September 12, 2008	Plaintiffs' motion for summary judgment
October 10, 2008	Defendants' opposition to plaintiffs' motion and cross-motion to dismiss, or in the alternative, for summary judgment
November 7, 2008	Plaintiffs' reply on motion for summary judgment and opposition to defendants' motion
December 5, 2008	Defendants' reply

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In making this proposal, the parties agree that defendants' time to answer or otherwise respond to the complaint is extended to October 10, 2008.

We respectfully request that the Court approve the proposed schedule and waive the requirement set forth in Your Honor's Individual Rules for a pre-motion conference prior to the filing of motions for summary judgment.

Thank you for your consideration of this request.

Respectfully,

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U.S. Department of Justice

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